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November 22, 2022

Hon. J. Paul Oetken
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Nunez et al.
22-CR-293 (JPO)

Dear Judge Oetken:

I am the assigned counsel for **Yorkis Chevalier**, a defendant in the above-captioned case. I write today to request modifications to Mr. Chevalier's bail conditions.

Mr. Chevalier was arrested on August 24, 2022, and was released on a \$75,000 bond signed by three financially responsible persons with home detention location monitoring. Mr. Chevalier resides at 124 Fort George Avenue, Apt. G in upper Manhattan. He resides there with Genesis Ventura (a bond signer) and their two children, ages 3 and 5. Ms. Ventura's father (also a bond signer) is the superintendent of the building and resides with his wife in an apartment next door to the defendant's apartment. Ms. Ventura's sister also has an apartment in the same building.

On October 13, 2022, Pretrial Services allowed the defendant to work as a handyman helper to his father-in-law at the apartment building where he resides.

I now respectfully write to the Court on his behalf to request the following modifications to the terms of his bail conditions:

First, Mr. Chevalier requests to be permitted to attend Thanksgiving dinner at his father- and mother-in-law's apartment next door on Thursday, November 24 from 2:00 pm until 10:00 pm that day.

Second, he requests to be permitted to go to Dave and Buster's on 34th St. in Manhattan on November 27, 2022, from 2:00 pm to 6:00 pm with approximately 10 close family members to celebrate his son's sixth birthday.

Third, he requests to be permitted to go to his son's school on 182nd St (about 11 blocks from his home) on November 28, 2022, between 1:30 and 2:30 pm to bring a cake and celebrate at his son's classroom pizza party. His wife and her daughter would also attend this event.

Pretrial Services informs us that Mr. Chevalier is in compliance with all conditions of his release. However, in an email to counsel this morning, Pretrial wrote that they "cannot consent to the three requests . . . as it is our office policy to object to social gatherings." Therefore, Pretrial defers to the Court. The Government defers to Pretrial.

Thank you for your consideration of these modifications and for continued courtesies to counsel.

Granted.
So ordered.
11/22/2022

Respectfully submitted,
_____/s/_____
Richard H. Rosenberg, Esq.



J. PAUL OETKEN
United States District Judge